

October 29, 2010

Christopher Hughy
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
2010 NOV -4 AM 11:26
OFFICE OF GENERAL
COUNSEL

MUR #

6424

Re: Complaint against Candidate Todd Lally and Lally for Congress

Dear Mr. Hughy:

Please consider this letter as an official complaint for willful violations of Federal Election Laws and Federal Election Commission regulations by Todd Lally, candidate for the U.S. House of Representatives in Kentucky's Third Congressional District; his congressional committee campaign, Lally for Congress; and his Treasurer, J. Ashley Cooper (hereinafter collectively referred to as "Lally Campaign").

The Lally Campaign clearly violated federal election law in its October Quarterly 2010 and Pre-General 2010 reports to the Federal Election Committee ("FEC") by failing to properly designate contributions received by federally registered political action committees ("PAC"). The Lally Campaign designated the vast majority of its PAC contributions as money received from "organizations" instead of donations from PACs. Federal Election law imposes different restrictions and contribution limits on a congressional candidate's acceptance of donations from federally registered PACs than donations received from unregistered organizations. See 11 CFR 110.1(b); 11 CFR 102.5.

Below are the PAC names, dates, and contribution amounts of inaccurately reported PAC donations contained on the Lally Campaign's October Quarterly 2010 report:

1. Iraq Veterans for Congress PAC at \$1,000 on 9/30/10
2. Pharmerica PAC at \$2,500 on 9/30/10
3. Kentucky Bankers PAC at \$5,000 on 9/28/10
4. American Society of Interventional Pain at \$5,000 on 9/28/10
5. National Stone, Sand & Gravel Association RockPAC at \$2,000 on 9/30/10
6. Association of Builders and Contractors PAC at \$5,000 on 9/30/10

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Below are the PAC names, dates, and contribution amounts of inaccurately reported PAC donations contained on the Lally Campaign's Pre-General 2010 report:

1. Automotive Free International Trade PAC at \$3,000 on 10/4/10
2. Build PAC at \$5,000 on 10/7/10

The Lally Campaign knows how to accurately report PAC contributions as it did so with the \$5,000 donation received on 8/15/10 from The Freedom Project (see October quarterly report) and again with the \$5,000 donation on 10/7/10 from Alliance Coal PAC (see pre-general report).

The Lally Campaign's willful violation of federal election law distorts the nature of its contributors and prevents the public from knowing and evaluating the amount of PAC money financing the Lally Campaign.

Accordingly, I respectfully request that the Commission conduct an immediate investigation into the allegations outlined above and penalize the Lally Campaign for any violations. Thank you for your attention to this matter.

To the best of my knowledge, information and belief, the above stated allegations are accurate.


MAXWELL MORLEY

Louisville, KY 40217

STATE OF KENTUCKY

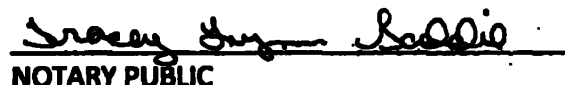
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COUNTY OF JEFFERSON

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SUBSCRIBED AND SWORN to before me by Maxwell Morley this 29th day of October, 2010.

My Commission Expires: 5/19/2012


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